

In re:  
The Litigation Practice Group P.C.  
Debtor

Case No. 23-10571-SC  
Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0973-8  
Date Rcvd: Jul 03, 2023

User: admin  
Form ID: pdf042

Page 1 of 4  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 05, 2023:

Recip ID	Recipient Name and Address
db	+ The Litigation Practice Group P.C., 17542 17th St, Suite 100, Tustin, CA 92780-1981

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 05, 2023

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 3, 2023 at the address(es) listed below:

Name	Email Address
Alan Craig Hochheiser	on behalf of Creditor City Capital NY ahochheiser@mauricewutscher.com arodriguez@mauricewutscher.com
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Andrew Still	on behalf of Interested Party Courtesy NEF astill@swlaw.com kcollins@swlaw.com
Byron Z Moldo	on behalf of Interested Party Byron Moldo bmoldo@ecjlaw.com amatsuoka@ecjlaw.com,dperez@ecjlaw.com
Christopher Celentino	on behalf of Plaintiff Richard A. Marshack christopher.celentino@dinsmore.com caron.burke@dinsmore.com
Christopher Celentino	on behalf of Trustee Richard A Marshack (TR) christopher.celentino@dinsmore.com caron.burke@dinsmore.com

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Christopher Ghio

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Laila Masud

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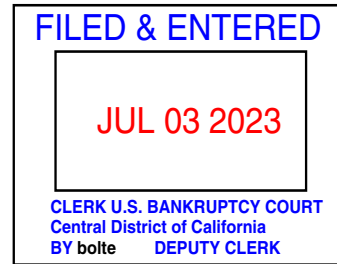
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TOTAL: 56

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Proposed Special Counsel to Richard A. Marshack,  
Chapter 11 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SANTA ANA DIVISION**

In re:

THE LITIGATION PRACTICE GROUP P.C.,  
Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

**ORDER ON TRUSTEE'S EX PARTE  
NOTICE OF NON-MATERIAL  
MODIFICATION TO PROMISSORY  
NOTE WITH ADDITIONAL LENDER AS  
PART OF PREVIOUSLY APPROVED  
POST-PETITION FINANCING**

Date: June 30, 2023

Time: 12:30 p.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C  
411 West Fourth Street  
Santa Ana, CA 92701

On June 16, 2023, Richard A. Marshack, the Chapter 11 Trustee (the "Trustee") for the  
bankruptcy estate (the "Estate") of The Litigation Practice Group, P.C., in the above-captioned  
bankruptcy case filed a *Notice of Motion and Emergency Motion (I) for Entry of Interim Order:*  
(A) *Authorizing The Trustee to Obtain Post-Petition Financing and Superpriority Administrative*

1 *Expense Claim Pursuant to 11 U.S.C. § 364; and (B) Setting Final Hearing; and Pursuant to Final*  
2 *Hearing, (II) for Entry of Final Order Approving Post-Petition Financing on a Final Basis* [Docket  
3 No. 119] (the "Financing Motion"). This Court heard the Financing Motion and On June 22, 2023,  
4 entered an Interim Order [Docket No. 131] granting the Financing Motion that, among other things,  
5 set a Final Hearing on July 20, 2023, authorized the Trustee to borrow up to \$800,000.00 of Post-  
6 Petition Financing in advance of the Final Hearing, and gave the Trustee the authority to make non-  
7 material changes to the terms of the Post-Petition Financing in advance of the Final Hearing with  
8 notice.

9 On June 29, 2023, the Trustee filed a Notice in the case that he would be using a lender  
10 different than the one identified in the Financing Motion to make advances over and above the  
11 amounts the original lender had already lent. Because the Estate required additional funding to  
12 make payroll and pay other necessary expenses, the Trustee reached out to third parties to identify  
13 a new third party willing to lend the balance of the funds to the Estate. One of these third parties  
14 was willing to lend to the Estate, and the Trustee filed the Notice advising of the Estate's intention  
15 to execute a second promissory note with the new lender.

16 In response to the Ex Parte Notice, the Court set the matter for hearing on June 30, 2023, at  
17 12:30 p.m. and required the Trustee to provide notice of that hearing. Notice was provided as  
18 ordered on June 29, 2023. The Court, having considered the Notice, all pleadings filed in support  
19 of, having heard oral argument, and good cause appearing including the reasons stated on the record,  
20 and in the Notice, the Court ordered as follows:

21 IT IS ORDERED that:

22 1. The Ex Parte Notice is granted and Trustee may proceed with the identified  
23 replacement lender;

24 2. Trustee is authorized to borrow \$560,000 from Liberty Acquisitions Group, Inc. or  
25 its assignee and execute the second Super-Priority Promissory Note (the "Additional Note")  
26 attached as **Exhibit 2** to the Trustee's Declaration;

27 3. Trustee shall file a declaration by 5:00 p.m. on Monday, July 3, 2023, that attaches  
28 a copy of the Note he executed in favor of the initial lender, Resolution Ventures, as well as a copy

1 of the Additional Note executed in favor of the replacement lender, Liberty Acquisitions Group,  
2 Inc.


3 4. There shall be no stay of this Order, pursuant to Rule 6004(h) of the Federal Rules  
4 of Bankruptcy Procedure (to the extent applicable) or otherwise;

5 5. The Court retains jurisdiction with respect to all matters arising from or related to  
6 the implementation of this Order.

7 6. The Final Hearing on post-petition financing is continued from July 20, 2023, at 9:30  
8 a.m. to August 10, 2023, at 10:00 a.m.

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24 Date: July 3, 2023

  
Scott C. Clarkson  
United States Bankruptcy Judge